

HONORABLE THOMAS S. ZILLY

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

HUNTERS CAPITAL, LLC et al.,

Plaintiffs,

v.

CITY OF SEATTLE,

Defendant.

Case No. 20-cv-00983 TSZ

DECLARATION OF JOSEPH GROSHONG  
IN SUPPORT OF CITY OF SEATTLE'S  
MOTION FOR A STAY OF DISCOVERY

I, Joseph Groshong, declare as follows:

1. I am an Assistant City Attorney for the City of Seattle. I am over age 18, competent to be a witness, and making this declaration based on facts within my own personal knowledge.

2. Attached as **Exhibit 1** are true and correct copies of Plaintiff Hunters Capital, LLC's First Requests for Production to Defendant City of Seattle, which were served on August 31, 2020.

3. Attached as **Exhibit 2** are true and correct copies of Plaintiff Hunters Capital, LLC's First Set of Interrogatories to Defendant City of Seattle, which were served on August 31, 2020.

4. The City has started work on its responses to the plaintiffs' pending discovery requests.

I swear under the penalty of perjury under the laws of the United States that the foregoing is true and correct.

s/ Joseph Groshong  
JOSEPH GROSHONG